

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

GREGG SMITH,  
MICHAEL NOWAK, and  
CHRISTOPHER JORDAN

Defendants.

No. 19 CR 669

Judge Edmond E. Chang

**JOINT MOTION TO MODIFY CONDITIONS OF RELEASE**

The United States of America, through undersigned counsel, jointly with the defendants, respectfully moves the Court to modify the defendants' conditions of pretrial release, and in support thereof states as follows:

1. The defendants were arrested on September 16, 2019, and were released the same day on conditions that, *inter alia*, prohibited or limited their contact with certain persons (the "no-contact condition").

2. The defendants were arraigned on October 22, 2019. At the arraignment, counsel for certain of the defendants asked the Court to modify the no-contact provision. The Court ordered the parties to confer and report back.

3. The parties have now conferred and jointly request that the Court modify the no-contact condition to include the following language:

a. Defendant Smith: "No contact outside the presence of counsel with anyone who, during Smith's period of employment on JPMorgan's Global

Precious Metals Trading Desk, (1) was an employee on that Desk, (2) was a client of that Desk, or (3) was a compliance officer who covered that Desk.”


b. Defendant Nowak: “No contact outside the presence of counsel with anyone who, during Nowak’s period of employment on JPMorgan’s Global Precious Metals Trading Desk, (1) was an employee on that Desk, (2) was a client of that Desk, or (3) was a compliance officer who covered that Desk.”

c. Defendant Jordan: “No contact outside the presence of counsel with anyone who, during Jordan’s period of employment on JPMorgan’s Global Precious Metals Trading Desk, (1) was an employee on that Desk, (2) was a client of that Desk, or (3) was a compliance officer who covered that Desk.”

Dated: October 29, 2019

Respectfully submitted,

ROBERT ZINK  
Chief, Fraud Section  
Criminal Division  
U.S. Department of Justice

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